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4 UNITED STATES,
5 Plaintiff,

6 v.
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8 ALFONZO WILLIAMS, et al
9 Defendant.

10 Case No. 13-cr-00764-WHO

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15 **HEIGHTENED PROTECTIVE ORDER**

16 For purposes of this order, any discovery produced pursuant to this Order will be referred to as
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18 “Heightened Protected Discovery,” and be produced pursuant to the following conditions:

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1. The individual defendants shall not be given access to the Heightened Protective
Discovery until further order of the Court.
2. Heightened Protected Discovery produced by the United States shall be designated with a
special Bates-stamp or coding chosen by the Government after consultation with the
defense. Any discovery so designated by the United States and any discovery that the
Court requires to be produced pursuant to this Order will be subject to the terms of this
Order. Should counsel for any defendant believe that a designated document is not
properly Heightened Protected Discovery, s/he shall raise this issue with the United States.
If the parties are unable to agree on the status of a given item of discovery, counsel for the
defendant may seek leave of the Court to de-designate the item. However, all items

United States District Court
Northern District of California

1 designated as Heightened Protected Discovery must be treated as such until de-designated
2 by the producing party or the Court.

3 3. The contents of the Heightened Protected Discovery provided by the Government shall not
4 be disclosed by the defense to any person except as set forth in this Order.
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6 4. After the production of Heightened Protected Discovery, counsel for any defendant that
7 has been authorized to receive the discovery may disclose it only to staff attorneys,
8 paralegals and investigators working directly under the supervision of that counsel of
9 record. Said counsel and/or any investigator(s) retained on behalf of his or her client to
10 assist in the defense of this matter may conduct investigation of matters included in the
11 Heightened Protected Discovery.
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13 5. Said counsel shall maintain a list of all persons who have reviewed the Heightened
14 Protected Discovery.
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16 6. Prior to receiving access to the Heightened Protected Discovery pursuant to this Order, all
17 individuals shall sign a copy of this order acknowledging that they have reviewed and will
18 abide by the order.
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20 7. No person other than the persons described in paragraph 4 may be allowed to examine
21 Heightened Protected Discovery without further court order. Heightened Protected
22 Discovery will be maintained in a secure environment which is reasonably certain to not
23 expose the materials to individuals not listed above.
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25 8. No copies of Heightened Protected Discovery may be provided to counsel for defendants
26 other than those specified by the Court by court order.
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9. Any pleadings that include or make reference to the witness names, statements, or the above-described orders or their contents shall be filed under seal.

10. Upon conclusion of this matter in the District Court, counsel will return to the Court for a determination regarding the manner in which Heightened Protective Discovery will be maintained by counsel, returned to the Government, or destroyed.

11. This order is binding on successor counsel, if any, including appellate counsel, and a copy of this order will be transmitted to such successor counsel with the materials protected by this order, all without prejudice to successor counsel's right to move the Court for an order modifying or vacating this order. Before Heightened Protected Discovery can be turned over to successor counsel, successor counsel must sign a copy of this order.

IT IS SO ORDERED.

Dated: February 13, 2015

W.H.2e

WILLIAM H. ORRICK
United States District Judge